

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:25-CV-21679-GAYLES/GOODMAN

CARLOS MANUEL VASQUEZ LOPEZ,

Plaintiff,

vs.

HENRY VERA,

Defendant.

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PLAINTIFF'S STATEMENT OF CLAIM

Plaintiff, Carlos Manuel Vasquez Lopez, pursuant to this Court's Order entered April 16, 2025 [ECF No. 8], files this Statement of Claim based on the information known to him, and estimates as follows:

Preliminary Statement

This Statement of Claim is not to be construed as a demand, nor as an exact quantification of Plaintiff's damages, but merely as a case management tool required by the Court. *See Calderon v. Baker Concrete Const., Inc.*, 771 F.3d 807, 811 (11th Cir. 2014) ("That document is an extra-Rules practice used by the district court for its convenience and to aid in case management. It does not have the status of a pleading and it is not an amendment under Rule 15 of the Federal Rules of Civil Procedure.")

Information Requested by the Court

1. Plaintiff does not have all of the time and pay records from his employment with Defendant in his possession at this time, and so he must estimate the hours he worked, the pay he received for those hours, and the corresponding wages due.

2. Plaintiff prepared this Statement of Claim with the assistance of counsel.

3. Plaintiff estimates that he is owed a total of **\$4,544.00** in unpaid straight-time wages, for work he performed between October 7, 2024 and November 10, 2024.

4. Plaintiff calculates his estimate of unpaid straight-time wages as follows:

Period Start	Period End	Hourly Rate	Hours Worked	Wages Owed
10/7/24	10/20/24	\$16.00	100	\$1,600.00
10/21/24	11/3/24		100	\$1,600.00
11/4/24	11/17/24		84	\$1,344.00

Total: \$4,544.00

5. Additionally, Plaintiff estimates that he is owed a total of **\$1,900.00** in unpaid overtime wages, for work he performed between May 1, 2024 and November 3, 2024.

6. Plaintiff calculates his estimate of unpaid overtime wages as follows:

Period Start	Period End	Hourly Rate	Overtime Rate	Overtime Worked	Wages Owed
4/22/24	5/5/24	\$12.00	\$6.00	10	\$60.00
5/6/24	5/19/24	\$12.00	\$6.00	20	\$120.00
5/20/24	6/2/24	\$12.00	\$6.00	20	\$120.00
6/3/24	6/16/24	\$12.00	\$6.00	20	\$120.00
6/17/24	6/30/24	\$12.00	\$6.00	20	\$120.00
7/1/24	7/14/24	\$12.00	\$6.00	20	\$120.00
7/15/24	7/28/24	\$12.00	\$6.00	20	\$120.00
7/29/24	8/11/24	\$16.00	\$8.00	20	\$160.00
8/12/24	8/25/24	\$16.00	\$8.00	20	\$160.00
8/26/24	9/8/24	\$16.00	\$8.00	20	\$160.00
9/9/24	9/22/24	\$16.00	\$8.00	20	\$160.00

9/23/24	10/6/24	\$16.00	\$8.00	20	\$160.00
10/7/24	10/20/24	\$16.00	\$8.00	20	\$160.00
10/21/24	11/3/24	\$16.00	\$8.00	20	\$160.00

Total: \$1,900.00

7. Plaintiff also seeks liquidated damages in an amount equal to the above unpaid straight-time and overtime wages, plus reasonable attorneys' fees and costs pursuant to the FLSA.

8. Plaintiff's Statement of Claim is based on the information currently known and/or available to him.

9. Plaintiff reserves the right to amend this Statement of Claim based on additional information provided by Defendant through discovery, and/or as additional/different information becomes known.

10. This Statement of Claim does not include any computation of damages other than those sought in the operative/pending Complaint and is subject to revision through the course of discovery and/or the amendment of the Complaint.

Respectfully submitted this 30th day of April 2025,

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